



State of Utah

Department of
Environmental Quality

Richard W. Sprott
Executive Director

DIVISION OF AIR QUALITY
Cheryl Heying
Director

JON M. HUNTSMAN, JR.
Governor

GARY HERBERT
Lieutenant Governor

DAQE-IN0133260004-08

April 16, 2008

Bridgette Laukhuff
Conestoga Wood Specialties Corporation
P.O. Box 158
East Earl, Pennsylvania 17519

Dear Ms. Laukhuff:

Re: Intent to Approve: Modification to Approval Order DAQE-AN133260003-07 to Increase VOC and HAPs Emissions, Tooele County – CDS B; ATT
Project Code: N013326-0004

The attached document is the Intent to Approve for the above-referenced project. The Intent to Approve is subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any questions you may have on this project to Mr. Tom Bradley. He may be reached at (801) 536-4014.

Sincerely,

John T. Blanchard, Manager
Minor New Source Review Section

JTB:TJB:sa

cc: Tooele County Health Department

STATE OF UTAH

Department of Environmental Quality

Division of Air Quality

**INTENT TO APPROVE: Modification to Approval
Order DAQE-AN133260003-07 to Increase
VOC and HAPs Emissions**

**Prepared By: Tom Bradley, Engineer
(801) 536-4014
Email: tjbradley@utah.gov**

INTENT TO APPROVE NUMBER

DAQE-IN0133260004-08

Date: April 16, 2008

Conestoga Wood Specialties Corporation

**Source Contact
Bridgette Laukhuff
(717) 445-3388**

**M. Cheryl Heying
Executive Secretary
Utah Air Quality Board**

Abstract

Conestoga Wood Specialties Corporation has requested a modification to their Approval Order # DAQE-AN133260003-07, dated February 2, 2007, to increase Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) emissions. Conestoga Wood Specialties Corporation operates a kitchen cabinet manufacturing operation in Tooele, Utah. The VOC and HAPs increase is due to changes made during startup of the operation. The VOC and HAPs emissions are from adhesives and Ultraviolet (UV) marking products used in their process. Conestoga has found they need to use additional adhesives and UV marking products than originally planned. Also the HAPs emission limits were omitted from the previous Approval Order due to their very low estimated annual emission.

Conestoga Wood Specialties Corporation manufactures high volume cabinetry with emissions being mainly in the form particulate matter from cutting, milling, and sanding of lumber. The emissions from this process are controlled by four baghouses. Conestoga Wood Specialties Corporation then ships the manufactured cabinets off site for the coating to be applied.

Conestoga Wood Specialties Corporation will be in Tooele located in Tooele County. Tooele County is an attainment area of the National Ambient Air Quality Standards (NAAQS). New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Achievable Control Technology (MACT) regulations do not apply to this source. Title V of the 1990 Clean Air Act does not apply to this source.

There will be 0.87 tons per year increase in VOC emissions and 0.15 tons per year increase in HAPS.

The changes in emissions will result in the following, in tons per year, potential to emit totals: $PM_{10} = 10.24$, $VOC = 0.90$, $HAPs = 0.15$

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order by the Executive Secretary of the Utah Air Quality Board.

A 10-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in the Tooele Transcript on April 17, 2008. During the public comment period, the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing, it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed Approval Order conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the Approval Order will be based upon the following conditions:

General Conditions:

1. This Approval Order applies to the following company:

Site Office

Conestoga Wood Specialties Corporation
600 North Industrial Loop
Tooele, Utah 84074

Corporate Office Location

Conestoga Wood Specialties Corporation
P.O. Box 158
East Earl, Pennsylvania 17519

Phone Number

(717) 445-3388

Fax Number

(717) 445-3427

The equipment listed in this Approval Order shall be operated at the following location:

600 North Industrial Loop Rd, Tooele

Universal Transverse Mercator (UTM) Coordinate System: 4,487.0 kilometers Northing,
385.7 kilometers Easting, Zone 12, Datum NAD 27

2. All definitions, terms, abbreviations, and references used in this Approval Order (AO) conform to those used in the UAC R307 and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
5. All records referenced in this AO, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for the minimum period of two years.
6. Conestoga Wood Specialties Corporation (Conestoga) shall increase the VOC and HAPS emissions and conduct its operations of the kitchen cabinet manufacturing in accordance with the terms and conditions of this AO, which was written pursuant to Conestoga's NOI submitted to the Division of Air Quality (DAQ) on March 14, 2008 and subsequent information submitted on March 26, 2008.
7. This AO shall replace the AO (DAQE-AN133260003-07) dated February 2, 2007.
8. The approved installations shall consist of the following equipment or equivalent*:

Four 47,515 acfm baghouses

* Equivalency shall be determined by the Executive Secretary.

9. A manometer or magnehelic pressure gauge shall be installed to measure the differential pressure across the fabric filter. Static pressure differential across the fabric filter shall be between 1 to 4 inches of water column. The pressure gauge shall be located such that an inspector/operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 1.0 inches water column. The instrument shall be calibrated according to the manufacturer's instructions at least once every 12 months.

Limitations and Tests Procedures

10. Visible emissions from the following emission points shall not exceed the following values:

- A. Baghouses - 10% opacity
- B. All other emission sources - 20% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

11. The following consumption limit shall not be exceeded:

8,214,207 square feet of rough lumber the company uses per rolling 12-month period

To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of consumption shall be kept for all periods when the plant is in operation. Consumption shall be determined by Conestoga. The records of consumption shall be kept on a daily basis.

Fuels

12. The owner/operator shall use natural gas as fuel in the comfort heaters and the evaporative cooler.

VOC and HAPs Limitations

13. The plant-wide emissions of VOCs and HAPs from solvents, adhesives, etc. and associated operations shall not exceed:

0.9 tons per rolling 12-month period for VOCs

50.00 pounds per rolling 12-month period for Toluene

15.00 pounds per rolling 12-month period for Hexane

30.00 pounds per rolling 12-month period for Methanol

205.00 pounds per rolling 12-month period for all other HAPS

Compliance with each limitation shall be determined on a rolling 12-month total. Based on the last day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 20 days after the end of each calendar month.

The VOC and HAP emissions shall be determined by maintaining a record of VOC and HAP emitting materials used each month. The record shall include the following data for each material used:

- A. Name of the VOC and HAPs emitting material, such as: paint, adhesive, solvent, thinner, reducers, chemical compounds, toxics, isocyanates, etc.
- B. Density of each material used (pounds per gallon)
- C. Percent by weight of all VOC and HAP in each material used
- D. Gallons of each VOC and HAP emitting material used
- E. The amount of VOC and HAP emitted monthly by each material used shall be calculated by the following procedure:

$$\text{VOC} = \frac{\% \text{ VOC by Weight}}{(100)} \times [\text{Density } (\frac{\text{lb}}{\text{gal}})] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

$$\text{HAP} = \frac{\% \text{ HAP by Weight}}{(100)} \times [\text{Density } (\frac{\text{lb}}{\text{gal}})] \times \text{Gal Consumed} \times \frac{1 \text{ ton}}{2000 \text{ lb}}$$

Monitoring - General Process

14. The owner/operator shall install, calibrate, maintain, and operate a magnehelic pressure gauge for the continuous measurement of the change in pressure of the gas stream through the baghouses. The monitoring device must be certified by the manufacturer. The monitoring device shall be accurate within plus or minus one inch of water gauge and must be calibrated on an annual basis according to the manufacturer's instructions. Continuous recording for the monitoring device is not required. However, daily records of readings shall be maintained.

Records & Miscellaneous

15. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this AO, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on the equipment authorized by this AO shall be recorded.
16. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

Under R307-150-1, the Executive Secretary may require a source to submit an emission inventory for any full or partial year on reasonable notice.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the DAQ. The UAC R307 rules used by DAQ, the NOI guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include point source and do not include fugitive emissions, fugitive dust, road dust, tail pipe emissions, grandfathered emissions etc. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for this source are currently calculated at the following values:

| | <u>Pollutant</u> | <u>Tons/yr</u> |
|----|------------------------|----------------|
| A. | PM ₁₀ | 10.24 |
| B. | VOC..... | 0.90 |
| C. | HAPs..... | 0.15 |

The DAQ is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final AO.

Sincerely,

John T. Blanchard, Manager
Minor New Source Review Section